

# Exhibit 64

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CIVIL ACTION NO. 1:14-CV-00954-LCB-JLW

STUDENTS FOR FAIR  
ADMISSIONS, INC.,

Plaintiff,

vs.

UNIVERSITY OF NORTH  
CAROLINA, et al.,

Defendants.

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DEPOSITION  
OF  
PATRICK CURRAN

THIS DEPOSITION CONTAINS HIGHLY CONFIDENTIAL AND  
PROPRIETARY INFORMATION AND IS SUBJECT TO A PROTECTIVE  
ORDER RESTRICTING PUBLIC DISCLOSURE OF ITS CONTENTS

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TAKEN AT THE OFFICES OF:  
THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL  
222 East Cameron Avenue  
110 Bynum Hall  
Chapel Hill, NC 27514

12-05-18  
9:58 A.M.

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Court Reporter

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1 middle for that paragraph it says that, "The  
2 subcommittee developed infrastructure for  
3 statistical and data analyses that ultimately can  
4 be used to evaluate potential race neutral  
5 alternatives strategies."

6 And I want to understand. So, is it  
7 correct then that the subcommittee has been  
8 preparing to do race neutral alternatives  
9 simulations and has worked on an infrastructure  
10 for it but has not yet actually conducted any race  
11 neutral alternatives simulations?

12 MS. COMBS: Objection.

13 A. That is correct.

14 Q. (Mr. McCarthy) Okay, thanks. Okay.  
15 Let's go down to the next paragraph.

16 A. Yes, sir.

17 Q. This paragraph talks a little bit about  
18 the model you just mentioned and it says -- I'm  
19 going to read a sentence from the middle of this  
20 paragraph. It says, "Key findings..." Do you see  
21 that one?

22 A. I do.

23 Q. Okay. It says, "Key findings reflect  
24 that there are a large number for unique applicant  
25 variables that predict admissions status,

1 random forest using 500 decision trees and then  
2 measured the importance of each predictor variable  
3 according to how much each variable added to the  
4 accuracy of the classification."

5 Q. Okay. Could you read the next sentence,  
6 too?

7 A. "The 14 predictors considered for the  
8 response admit were ranked according to their  
9 importance in deciding the classification factor."

10 Q. Thank you. And then there's a figure  
11 that illustrates that analysis of those predictor  
12 variables, correct?

13 A. There is.

14 Q. Okay. And by this analysis, what is the  
15 most important predictor variable in the  
16 admissions process?

17 A. My understanding of the results is it is  
18 whether the student was a resident or not.

19 Q. Okay. And that's the variable RES ID?

20 A. Yes, sir.

21 Q. Thank. Let's move forward a few  
22 pages and I'm sorry, this document is not numbered  
23 ---

24 A. That's fine.

25 Q. --- with normal page numbers, but I can

1 would be effective."

2 Did I read that correctly?

3 A. You did.

4 Q. Okay. Earlier you testified that the  
5 Data Analytic Subcommittee has not actually  
6 conducted any simulations of race neutral  
7 alternatives yet, is that correct?

8 A. That is correct.

9 Q. Okay. So is this sentence that I just  
10 read here about empirical results, is that a  
11 reference to empirical results discussed in the  
12 literature review -- done by the literature review  
13 subcommittee?

14 A. I do not know to what that sentence  
15 directly refers.

16 Q. Okay. But it does not -- strike that.

17 But given that the Data Analytic  
18 Subcommittee has not done any race neutral  
19 alternatives simulations yet, it certainly doesn't  
20 refer to any of that type of analysis, correct?

21 MS. COMBS: Objection.

22 A. That is correct.

23 Q. (Mr. McCarthy) Okay. Okay. Are you  
24 aware of any empirical results from the Data  
25 Analytic Subcommittee that, quote, "do not suggest

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